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1 A Yes.

2 Q At the very top, you say that:

3 "The study I have performed for
4 the U.S. LEC industry in the FCC
5 Price Cap Proceeding is a close
6 approximation to the anticipated BLS
7 study."

8 Do you see that?

9 A Yes.

10 Q And that study in the FCC proceeding is the
11 one we've been talking about, the January 1993 update,
12 correct?

13 A That is correct.

14 Q Now, has anyone at BLS provided you with any
15 preliminary results of the BLS LEC study?

16 A No.

17 Q Does BLS utilize the same methodology
18 in performing its productivity studies that you used
19 in the study that you did for the FCC proceeding?

20 A Yes, a very similar methodology.

21 Q Are there any differences?

22 A Some minor differences, yes.

23 Q Could you tell us what those differences are?

24 A Yes. The BLS uses a slightly different
25 assumption for the decline in efficiency of capital
26 stock.

27 Q Could you explain what you mean when you say
28 "the decline in efficiency in capital stock"?

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1 industry other than the LECs?

2 A Not to my knowledge.

3 Q Dr. Christensen, would you agree that,
4 particularly for an industry that is heavily impacted by
5 technological change, the nature of a firm's output may
6 change qualitatively from one period to the next?

7 A Well, that's true for any industry.

8 Q Now personal computers, for example, keep
9 getting more powerful each year; is that right?

10 A Yes.

11 Q If the quantity of personal computers produced
12 each year remained constant but the capability of each
13 unit increased by, say, 25 percent, how would that
14 factor be reflected in the measurement of output
15 quantity change that you utilize in your TFP study?

16 A Well, I didn't make any explicit assumption
17 about the price quantity, the composition of capital,
18 capital expenditures. That fact is based on the TPIs.

19 Q You made no assumption about them, the price
20 quantity ratios?

21 A That's correct. That's part of the TPI
22 computation.

23 Q Would you agree that an input in the LEC
24 industry may well be an output of some other industry
25 segment?

26 A Yes.

27 In fact, about 25 percent of the inputs used
28 by the LECs are what are called intermediate goods.

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1 Q And one of those, for example, one of the
2 LECs' capital inputs consists of some of the outputs in
3 the telecommunications equipment industry; is that
4 right?

5 A Yes, but those wouldn't be considered
6 intermediate goods. Those would be considered capital
7 goods.

8 Q Is the nature of the equipment used by LECs
9 constant over time, or does it undergo any qualitative
10 change from one period to the next?

11 A No, it changes over time.

12 Q Now Dr. Christensen, you said earlier today
13 that you had reviewed Dr. Duncan's testimony?

14 A I said I had read it.

15 Q Did you discuss it with Dr. Duncan before he
16 submitted it, either the direct or the reply?

17 A No.

18 Q Did you have any discussions with anyone at
19 GTE about responding to Dr. Selwyn's testimony
20 concerning the Bush-Uretsky report in the FCC order?

21 A No, I did not.

22 Q Why is it that you chose in your reply
23 testimony not to respond to Dr. Selwyn's testimony about
24 Bush-Uretsky other than the single reference you make on
25 page 10 of your reply?

26 A Well, as I indicate on page 10 of my reply,
27 this Bush-Uretsky was not really speaking to anything at
28 issue in this proceeding.

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1 Bush-Uretsky were looking at a very specific
2 question. They wanted to update an interexchange or, I
3 should say, interstate TFP estimate that the FCC had
4 done for the 1984 to 1990 period. And I don't believe
5 that's at issue here.

6 What is at issue here is the question of
7 whether on a going-forward basis there's reason to
8 believe that input prices for the LECs will rise less
9 rapidly or more rapidly than for the economy as a
10 whole.

11 And the Commission, the FCC, was very clear in
12 its decision that Dr. Selwyn's claim that the
13 post-divestiture input price information was not a
14 reliable basis for forecasting input price differences
15 going forward.

16 Q Dr. Duncan spends 11 pages of his 11-page
17 reply testimony challenging the Bush-Uretsky analysis;
18 do you recall that?

19 A I do.

20 Q Is your opinion that that testimony by
21 Dr. Duncan therefore is essentially irrelevant to what
22 the Commission is considering here?

23 A Well, I believe the whole Bush-Uretsky thing
24 is irrelevant and, therefore, Dr. Duncan's critique of
25 it is irrelevant.

26 Q Yesterday I asked Dr. Schmalensee whether he
27 agreed that the -- that if there were an input price
28 differential between the LECs and the economy as a whole

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1 that it ought to be reflected in the TFP study.

2 Do you recall that?

3 A I do.

4 Q And he agreed that if there were such a
5 differential that it ought to be reflected. Do you
6 agree?

7 A Yes.

8 Q Is that your opinion as well?

9 A I believe that's what I testified in my
10 original submission.

11 Q So again, the difference between you and
12 Dr. Selwyn on this issue is a factual question of
13 whether that input price differential exists, not how it
14 ought to be in a TFP study; right?

15 A Well, a question of whether it will exist.

16 Q Yes.

17 A Not whether you can take some historic
18 forecast period and say there was an input price
19 differential.

20 The question for this Commission on a
21 going-forward basis, are we looking to see input price
22 differential between the LECs and the U.S. economy.

23 Q And you believe that we don't?

24 A That's correct.

25 And I would refer you to my Chart 5 which I
26 think makes that very clear. Chart 5 and Page 14 of my
27 reply testimony which shows the from 1949 through 1993
28 the input price differential.

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1 And we'll see in Chart 4 just above it that
2 there has virtually been -- virtually no difference.
3 For the U.S. economy, there's been an average input
4 price growth of 4.75 percent per year; whereas for the
5 telephone industry, it's been 4.7 percent per year.
6 Virtually no difference.

7 As we can see in Chart 4, those lines right on
8 top of each other, there is a lot of year-to-year
9 variation as we see in Chart 5.

10 And what Dr. Selwyn would ask you to do is to
11 look at Chart 5 and just take that part in the lower
12 right-hand corner where it's all below the line and say,
13 let's use it as our forecast, which really doesn't make
14 any sense because, you know, that's just what Dr. Selwyn
15 likes to call cherry picking.

16 It's, you know -- take the point you're trying
17 to prove and going, looking for some numbers that
18 allegedly prove that which this doesn't at all.

19 If you look at the year immediately before
20 that, you see that it's very much above the line. That
21 was a period when LEC input prices were much greater
22 than the U.S. economy.

23 And there's a simple explanation for this.
24 The years just before 1984 were a period of rapidly
25 rising interest rates, and that makes LEC input prices
26 rise more rapidly than U.S. input prices; whereas in the
27 years from 1984 forward, for quite a few years there's
28 dramatically falling interest rates. That makes LEC

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1 prices fall relative to input prices in the U.S.
2 economy.

3 Well, over the past, over the post-divestiture
4 period, we had interest rates that have -- that are now
5 half as high as they were. They have fallen from
6 something on the order of, you know, 14 percent down to
7 7 percent. In order to use that period of forecast
8 forward, we'd have to assume that interest rates were
9 going down from 7 percent to zero in the next few years,
10 and that's just not a reasonable assumption to make.

11 And therefore, I think we really have to --
12 and I think most economists would say we have to look at
13 input price growth. We need to look at a longer term
14 differential you just can't take a short period. Or if
15 you do want to take a short period. You should look
16 at what's currently happening and say, well, let's look
17 at current data. Well, I don't think '84 is current. I
18 don't think most people would. 1984 is more than
19 10 years ago.

20 We're trying to now -- we're asking is this
21 input price differential appropriate in 1996 going
22 forward? Would we want to use 1990 and -- 1984 through
23 1992 to measure that? I don't think so.

24 I think we have to do one of two things: We
25 need to either take the long-run historical record,
26 which shows that there's no difference; or if we think
27 there's something peculiar that's going to happen in the
28 LEC industry going forward, we should look specifically

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1 at what's happening currently.

2 And the most recent data suggests that for the
3 years that interest rates were falling, that, yes, LEC
4 capital input prices were growing less rapidly, but
5 labor input prices were growing a bit more rapidly for
6 the LECs.

7 As the LECs also downsize and reduce their
8 labor forces, the mix of labor is moving in the
9 direction of more highly skilled labor. And whose --
10 therefore, if you look at the input price for labor,
11 that is rising relative to rest to the economy.

12 When you combine that with capital, you see
13 there's essentially no difference.

14 Q I don't know what the answer to my question
15 was.

16 (Laughter)

17 MR. FABER: I thought that what I asked was --

18 MR. SASSER: Would you like it read back?

19 (Laughter)

20 MR. FABER: I have in mind what I asked. I just
21 don't know what he said in response.

22 Q The question was, do you agree that the only
23 difference between you and Dr. Selwyn is that you have a
24 factual dispute about whether there is going to be a
25 long-term input price differential?

26 A No. You didn't see "is going to be." You
27 said whether there was.

28 Q That's correct. You corrected me. I said

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1 whether there was, and you said "is going to be," and
2 I'm willing to accept that correction.

3 A Is --

4 Q All I want to know is, do you agree that the
5 difference between the two of you is whether or not this
6 is going to exist?

7 A "Is going to exist," that's right. And I gave
8 some reasons why I think that, you know, the appropriate
9 way to look at it is the way that's long-term historical
10 evidence or current evidence, but not choosing some
11 period that just happens to suggest an answer one way or
12 the other.

13 Q I'm going to try again. I apologize, but I
14 still don't feel like I got a "yes" or "no."

15 The question, Dr. Christensen, is whether or
16 not you agree that the only difference between you and
17 Dr. Selwyn on the input price differential question is
18 the question of whether as a factual matter there is
19 going to be such an input price differential?

20 MR. SASSER: Your Honor, I'm going to object.
21 That's been asked and answered twice.

22 Dr. Christensen made very clear what his
23 answer was and the reasons for it.

24 MR. FABER: No. He told us whether he thinks
25 there's going to be an input price differential or not.
26 I didn't ask him whether he thinks there's one. I'm
27 asking if the difference between him and Dr. Selwyn is
28 on the factual question of whether there's going to be

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1 one.

2 ALJ REED: Dr. Christensen, if you understand
3 Mr. Faber's question, could you give him a direct
4 response, please?

5 THE WITNESS: Yes.

6 The answer is no, that's not the only
7 difference between Dr. Selwyn and myself on the input
8 price issue. That is a difference.

9 MR. FABER: Q Can you tell me what the other
10 differences are?

11 A Well, there's really a huge amount of
12 testimony going on about input pricing, and I don't
13 agree with all of that.

14 And I have made clear in my testimony what I
15 believe about input prices. You spent the whole morning
16 questioning me about things that go into the input
17 prices suggesting that, since he's been whispering in
18 your ear all morning, presumably that there's a
19 disagreement about the way I measure input prices and
20 he'll have a lot to tell about how you should measure
21 input prices.

22 So obviously, we don't completely agree on all
23 that about input price. But we certainly do disagree as
24 to -- sir, we do agree that the conceptual issue is, on
25 a going-forward basis, whether there will be a
26 difference in input prices.

27 Q And just to be clear, you do agree that if
28 there is a difference in input -- a differential in

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1 input prices that it ought to be taken into account in
2 the productivity factor?

3 A Not in a productivity factor; in the X
4 factor.

5 Q I refer to the them interchangeably. But
6 that's not --

7 A Well, it's not a productivity issue.

8 Q Okay. X factor.

9 A Yes.

10 Q Now, real briefly, we talked earlier about
11 TPIs, telephone plant indexes or indices.

12 A Yes.

13 Q There's a separate TPI maintained for each
14 type of plant; correct?

15 A Well, for a price, probably six categories of
16 plant, those categories presumably can be broken down
17 into additional categories, but there are a set of TPIs.

18 Q Well, isn't one of them office equipment that
19 we've been talking about; correct?

20 A Correct.

21 Q Transmission equipment?

22 A That's correct also.

23 Q Now, what is the unit that is used to measure
24 the price changes for each of the TPI categories?

25 A There are no units. They are pure numbers.

26 Q Well, are we talking about a unit of capacity
27 in measuring the changes in price, or are we talking
28 about some physical attribute of the category?

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1 A No. It's a -- the TPI is a -- what the price
2 per unit is in any year relative to what it was in
3 1984.

4 Q Well, let's talk about central office
5 equipment. What type of unit are we talking in
6 measuring the price change in central office equipment?

7 A Well, in terms of the investment figures,
8 the -- it's the dollar investment in central office
9 equipment.

10 And then that that in fact is what must be
11 done to get a TPI is to break that into a price and
12 quantity component.

13 And that is what the specialists at the LECs
14 were charged with doing was to take the investment in
15 central office equipment, all the other categories, and
16 say what part of this constitutes quantity and what part
17 constitutes price. And that's in fact what they do.

18 Q And my question to you is, what is it we are
19 measuring when we talk about the quantity?

20 A It's the quantity of capital.

21 Q If you are doing a TPI for automobiles, you
22 could pick a particular car and you could price it each
23 year and you could change -- you could determine a price
24 index for it; isn't that right?

25 A Yes, if it were a the same car last year and
26 this year. You could see what the price is for that
27 car.

28 Q And a TPI is designed to measure the same item

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1 over a period of time and the change in the price of
2 that item; right?

3 A That's correct.

4 Q When you do that for central office equipment,
5 as a category, what exactly is it that you're measuring
6 to see what prices changed?

7 A Well, as Dr. Schmalensee testified yesterday,
8 you have to take quality change into account, and that's
9 a challenging thing to do. But that's one of the things
10 that we as economists are trained to do, and what the
11 people at the Bureau of Labor Statistics do, and what
12 people at the LECs have done in order to come up with
13 these TPIs.

14 Q What methodology do you use -- stick for a
15 moment to central office equipment, for example -- to
16 measure quality changes over time?

17 A Well, as I testified this morning, I did not
18 measure quality changes over time. I taught the TPIs.
19 They were prepared by the LECs.

20 Q Well, that's fine. But then what
21 methodologies did the LECs use to measure quality
22 changes over time, if you know?

23 A I don't know in detail what they did.

24 Q So you don't know, for example, whether they
25 properly took into account quality changes over the
26 eight years that they measured?

27 A By the same token that I do know whether the
28 Bureau of Labor Statistics properly took into account

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1 capital when they were doing total factor productivity
2 for the U.S. economy.

3 It's not possible for me to go and know in
4 detail what each and every person did. There's a
5 certain point where I have to take the data that's given
6 to me.

7 MR. FABER: Your Honor, that's all the questions I
8 have for Dr. Schmalensee -- I'm sorry, Dr. Christensen.
9 But I do want to resolve the issue that I raised earlier
10 about the workpapers.

11 I've had a chance to go back and look at the
12 data requests, and we asked for the underlying
13 workpapers for three categories of items.

14 ALJ REED: Right.

15 MR. FABER: The changes to the 1984 capital stock;
16 the changes to the TPIs; and the changes to the booked
17 capital accounts. These are Data Request Nos. 6, 7 and
18 8. And I would like to have those provided to me, and I
19 would like to have an agreement that, without having to
20 recall Dr. Christensen, they can be admitted as exhibits
21 in this case for purposes of briefing since I won't have
22 any questions for him other than to verify that these
23 are the actual documents.

24 I'm willing to accept counsel's representation
25 that they are the actual underlying workpapers.

26 ALJ REED: Mr. Sasser?

27 MR. SASSER: Yes.

28 ALJ REED: Okay.

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1 MR. FABER: And then can we reserve exhibit
2 numbers, or we can just agree that we'll put numbers on
3 these with they arrive?

4 ALJ REED: That's fine.

5 MR. FABER: Thank you, your Honor.

6 With that, I'm finished. Thank
7 you, Dr. Christensen.

8 ALJ REED: Ms. O'Reilly.

9 MS. O'REILLY: Very briefly.

10 CROSS-EXAMINATION

11 BY MS. O'REILLY:

12 Q Good morning, Dr. Christensen. My name is
13 Kathleen O'Reilly and I represent TURN in this
14 proceeding.

15 A Good morning.

16 Q Good morning.

17 I'd like to direct your attention to the
18 bottom of page 15 of Exhibit 6, beginning at the
19 second-to-last line.

20 Do you see that part of your testimony where
21 you state that the LEC output growth rate for 1990 to
22 1993 was 2.9 percent, and the time frame 1984 to 1989,
23 that rate was 3.8 percent?

24 A Yes, I do.

25 Q My question is, how do these LEC output growth
26 rates compare to output growth rates for the economy as
27 a whole during those same periods?

28 A I don't know.

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1 Q Do you have information available that would
2 make possible your determination of that comparison?

3 A Sure. Not available here, but in my office I
4 do.

5 Q If you could provide that as a late exhibit, I
6 would appreciate it.

7 A Okay. I'd be happy to do this.

8 MS. O'REILLY: If we could, your Honor, reserve a
9 space for that.

10 ALJ REED: Yes.

11 MR. SASSER: Could I have the request restated so
12 I'm clear?

13 MS. O'REILLY: Surely. For the time frames 1990 to
14 1993, and the 1984 to 1989, if he could provide what the
15 output growth rates for the economy as a whole were for
16 those two time periods.

17 Is that that clear?

18 MR. SASSER: Thank you.

19 MS. O'REILLY: Q I'd also direct your attention
20 to Chart 1 on that same page.

21 A Yes.

22 Q And ask if that chart, in your opinion,
23 basically reflects a standard business cycle; namely,
24 that output growth rates will increase during a period
25 of economic expansion decline during a period of
26 recession and demonstrated upswing when the economy is
27 pulling out of a recession?]

28 A Well, this dotted line looks like a business

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1 cycle, but it doesn't coincide with the national
2 business cycle.

3 Q For that period?

4 A That's correct.

5 Q But as a general principle, it reflects what
6 would be a common cycle of up-swing/down-swing to
7 reflect expansion in an economy, recession, and the
8 transition between the two?

9 A Yes. It would have a similar shape as the
10 business cycle for the U.S. economy.

11 Q All right. Dr. Christensen, do you have an
12 opinion as to whether it is the absolute level of an LEC
13 TFP growth that is relevant to the determination of the
14 X factor, or is it the level of the LEC TFP growth rate
15 relative to the entire U.S. TFP growth rate that is
16 relevant to the X factor issue?

17 A It's the latter.

18 Q So the up-swing or the down-swing of the LEC
19 output growth rate is only relevant to the extent that
20 it varies from the U.S. economy as a whole's output
21 growth rate?

22 A Well, that's an interesting way to look at
23 it.

24 I haven't looked at it that way, and I think
25 that tends to complicate the issue, because then we'd be
26 saying, well, the X factor is going to be based on a
27 differential output growth rate and a differential input
28 growth rate, when it's really the combination of those.

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1 You combine the output growth rate and the
2 input growth rate to get a TFP growth rate.

3 I think it's complicated enough to try to
4 figure out what the right TFP growth rate is let alone
5 trying to say let's try breaking it up into pieces and
6 start looking at the pieces.

7 So you can break it up that way, but I don't
8 think it's helpful.

9 Q Stated another way, at any period of time
10 they're coincident, would you agree that looking at the
11 LEC TFP growth rate isn't relevant because it is
12 coincident with the U.S. Economy as a whole growth rate
13 for that period?

14 A It is certainly not uninteresting to compare
15 output growth rates.

16 As I've said, I don't think it's particularly
17 helpful, but there's no harm in looking behind the TPF
18 growth out and if there's some cycles in input and
19 output that lead one to think differently about the
20 differential, I think that's fine.

21 Q In preparation for your testimony, did you
22 have occasion to review recent Pacific Monthly
23 Monitoring Reports?

24 A Not that I recall.

25 MS. O'REILLY: That's all I have, your Honor.

26 MS. BURDICK: Your Honor, could I just ask a couple
27 of clarifying questions related to that.

28 ALJ REED: Yes.

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1 MS. BURDICK: The first one is, I'm uncertain
2 whether Ms. O'Reilly intended to reserve an exhibit
3 number for the national economy output growth rates that
4 she requested, or if, as Mr. Faber did, one will just be
5 assigned when those documents are provided.

6 ALJ REED: I'm assuming that, Ms. O'Reilly, you
7 meant the same thing that Mr. Faber did, that when they
8 come in, I will assign an exhibit number to them.

9 MS. O'REILLY: Whichever is most efficient for your
10 purposes is fine with me, your Honor.

11 ALJ REED: Okay.

12 MS. BURDICK: And is that how you'd
13 like to approach it, your Honor?

14 ALJ REED: Yes, that's how I'd like to do it.

15 MS. BURDICK: Then I just had one other question,
16 if I could, to follow on the computation of that; the
17 provision of that.

18 ALJ REED: Yes.

19 CROSS-EXAMINATION

20 BY MS. BURDICK:

21 Q Dr. Christensen, in providing that information
22 regarding the national economy output growth rates,
23 would you have to perform a computation much like that
24 reflected on Table 1 on page 10 of Exhibit 6?

25 A Yes.

26 Q Would you mind, Doctor, also providing those
27 underlying numbers in addition to the averages that
28 Ms. O'Reilly requested?

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1 A So are you asking would I provide the
2 year-by-year output growth for the U.S. economy?

3 Q Yes, sir.

4 A Yes, I would provide that.

5 MS. BURDICK: That would be very helpful. Thank
6 you.

7 That's all I had, your Honor. Thank you for
8 your patience.

9 ALJ REED: Ms. Grau

10 CROSS-EXAMINATION

11 BY MS. GRAU:

12 Q Dr. Christensen, my name is Janice Grau, and I
13 represent the Division of Ratepayer Advocates.

14 Good morning still.

15 A Good morning.

16 Q You were discussing with Mr. Faber the
17 differences that you remember between the assumptions
18 you used and the Bureau of Labor Statistics uses in its
19 TFP studies.

20 Now, on page 9 of your reply testimony, that
21 is, page 9 of the exhibit attached to -- the attachment
22 to Exhibit 7, you state, in the first full paragraph,
23 the fifth line down,

24 "For my USTA study of LEC
25 productivity growth, I used Moody's
26 composite yield for public utility
27 bonds as a proxy for the opportunity
28 and cost of capital for all LECs."

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1 Does the BLS use a similar approach to measure
2 the opportunity cost of capital?

3 A No. As I stated here, that this is a
4 difference in reason that the input prices for the U.S.
5 economy and the LECs are not directly comparable because
6 they use a different procedure there, which is more --
7 probably it is -- it's a broader opportunity cost of
8 capital that includes equity costs as well as interest
9 cost.

10 Q Okay. So then your footnote here actually is
11 stating that since you do not use equity, you in effect
12 are stating that the BLS does use equity?

13 A That's correct, and so that's right.

14 So this would be another difference I had not
15 referred to this morning. That's correct.

16 Q And therefore the use of equity by BLS in
17 measuring the opportunity cost of capital would lead to
18 a different pattern of input price growth?

19 A For the LECs you're saying --

20 Q For the LECs.

21 A -- if I include equity costs?

22 It would, yes.

23 Q Now, on page 10 you state that, again towards
24 the end, it starts four lines up, that,

25 "The existence of a short-term
26 1984 to 1990 input price
27 differential is not in dispute."

28 Would you similarly agree that --

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1 A Can I see where that statement is? I haven't
2 found it yet.

3 Q Yes. It's page 10, and it's towards the
4 bottom.

5 A Page 10.

6 Q And it's towards the bottom, four lines up.

7 A I have it. Thank you.

8 Q Would you similarly agree that over the 1984
9 to 1993 period, that there is an empirical basis for
10 concluding that an input price differential exists
11 between the telecommunications industry and the U.S.
12 economy?

13 A Yes.

14 Q Now may I go to your prepared testimony,
15 Exhibit 6, and Appendix 1 at page 12.

16 Under the Labor section, the first sentence of
17 the second paragraph states,

18 "The cost of labor input is

19 equal to expensed wages and salaries

20 plus expensed benefits,"

21 and that's how you measure the cost of labor, as the sum
22 of expensed wages and expensed benefits, is that
23 correct?

24 A That is correct.

25 Q And in your workpapers which support
26 Appendix 1, you show a 9.92 percent increase in the
27 price of labor between 1992 and 1993, is that correct?

28 A I would accept that subject to check.

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1 Q Now, is it a possibility that that increase in
2 the price of labor could be the result of including such
3 items as golden handshakes as part of expensed benefits
4 due to restructuring efforts and force reductions?

5 A It is possible.

6 In fact, it's my understanding that although a
7 large portion of such expenses are not included in the
8 labor report, there is not uniformity by the LECs in
9 their Form M and indeed there are some, some expenses
10 such as that included.

11 MS. GRAU: Thank you, Dr. Christensen.

12 That's all I have.

13 ALJ REED: Mr. Golabek, did you have any clarifying
14 questions.

15 MR. GOLABEK: No, I haven't.

16 ALJ REED: Okay.

17 EXAMINATION

18 BY ALJ REED:

19 Q Dr. Christensen, I just wanted to ask you two
20 questions.

21 I wanted to know whether or not you think rate
22 of return regulation can hinder efficiency?

23 A I do.

24 Q I also would like to know whether or not you
25 think that Pacific Bell has suffered severe financial
26 repercussions due to the price cap formulas' use of 4.5
27 and 5 percent over the last five years and nine months?

28 A I have not studied their financial situation

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1 so I don't consider myself an expert on the topic, but
2 it is my casual opinion that I don't believe that
3 they -- to date have suffered severe financial harm as a
4 result of the price cap formula.

5 ALJ REED: Thank you.

6 Mr. Sasser, did you have any redirect?

7 MR. SASSER: Yes, just a few short questions, your
8 Honor.

9 REDIRECT EXAMINATION

10 BY MR. SASSER:

11 Q Mr. Faber questioned you about your response
12 to Data Request 5 which is contained in Exhibit 8 for
13 identification.

14 Do you happen to have a copy of that before
15 you?

16 A Data request, which number?

17 Q Five.

18 A Five.

19 MR. FABER: Excuse me, your Honor.

20 ALJ REED: Yes.

21 MR. FABER: I don't remember asking any questions
22 about Data Request No. 5.

23 MR. SASSER: You certainly did.

24 They were in the nature of Dr. Christensen's
25 statement that he didn't know how the errors were
26 discovered.

27 MR. FABER: I asked him that about 6 and I asked
28 him that about 7. I didn't ask him about 5.